

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

MEGAN MCGUIRE,

Plaintiff,

v.

CORY COOPER, TIMOTHY DUNNING,
Individually and in his official capacity as
Sheriff of Douglas County, Nebraska, and
DOUGLAS COUNTY,

Defendants.

)
) Case No. 8:16-cv-00004
)
)
) Senior Judge Joseph Bataillon
)
) Magistrate Judge Susan M. Bazis
)
)
) JURY TRIAL DEMANDED
)

Trial Dates: August 27-31, 2018

Plaintiff's Exhibit List

Ex. No.	Description	Off	OBJ	RCVD	NOT RCVD	DATE
1.	DCSO IA File No. 2705 – Cooper COUNTY 375-786					
2.	Time-Lapse Screen Shot of Cooper GPS February 10, 2013					
3.	IA Investigation of Cooper Report (IA 2705) COUNTY 4010-4024					
4.	OPD Investigator's Report, Synopsis, Supplemental Report, and Attachments (Dated June 10, 2013) COUNTY 3945-3978					
5.	Various emails to/from Cooper to Galvan about camera not working and copying video <i>etc.</i> COOPER 495-503					
6.	Various emails to/from Cooper to Captain Wheeler – discretion on misdemeanors (2012) COOPER 504-505					
7.	Emails related to the Cooper investigation COUNTY 4385-4825, 5837-6048					
8.	Galvan Declaration COUNTY 1922-23					
9.	Rules of the Douglas County Sheriff's Office Merit Commission 2012 COUNTY 1-34					

10.	<i>State v. Cooper</i> June 1, 2013 Criminal Complaint COUNTY 285-286					
11.	<i>State v. Cooper</i> Apr 15, 2015 Amended Information COUNTY 289-290					
12.	<i>State v. Cooper</i> April 15, 2015 Plea COUNTY 291					
13.	<i>State v. Cooper</i> June 12, 2015 Sentencing Order COUNTY 292-293					
14.	DCSO General Order Code of Conduct 2012 COUNTY 328-340					
15.	DCSO General Order Law Enforcement Role and Authority 2008 COUNTY 341-343					
16.	DCSO General Order Administrative Investigation of Complaints 2008 COUNTY 344-349					
17.	DCSO General Order Search and Seizure 2012 Amended COUNTY 350-358					
18.	DCSO General Order In Car Video System 2008 COUNTY 359-361 COUNTY 4826-4831					
19.	DCSO General Order Communications, Radio Interoperability, Alternative/Cellular Communications 2012 COUNTY 362-367					
20.	DCSO General Order Early Intervention System COUNTY 4832-4850					
21.	Notice of Pre-Disciplinary Hearing Dated May 9, 2013 From Chief Deputy Bilek to Cooper COUNTY 368-370					
22.	Notice of Termination – Cooper Dated May 13, 2013 COUNTY 371					
23.	DCSO Official Oath – Cooper Dated Aug 12, 2008 COUNTY 372-374					
24.	DCHR Records – Cooper HR training COUNTY 1717					
25.	DCSO Cooper Personnel File					

	COUNTY 1736-1920					
26.	DCSO June 10, 2012 Press Release re: Cooper Arrest COUNTY 1921					
27.	Prosecution File for State v. Cooper COUNTY 1925-2335					
28.	Matrix of DCSO Internal Affairs (“IA”) investigations from 2005-Fall 2016 (with Affidavit from Martin) COUNTY 3097-3153					
29.	IA 1086 COUNTY 6524-6703					
30.	NSP File A02-1116-23847 COUNTY 6704-6755					
31.	IA File No. 1594, including audio video COUNTY 3154-3197, VIDEO: KANM0761_20151120032334					
32.	IA File No. 1704 COUNTY 3198-3495					
33.	IA File No. 1771 COUNTY 3496-3527					
34.	IA File No. 1941 COUNTY 3528-3542					
35.	IA File No. 1965 COUNTY 3543-3546					
36.	IA File No. 1984, including recorded statements of complainant and witnesses COUNTY 3547-3585					
37.	IA File No. 2325 COUNTY 3586-3599					
38.	IA File No. 2462 COUNTY 3600-3729					
39.	IA File No. 2840 COUNTY 3730-3732					
40.	IA File No. 2980 COUNTY 3733-3739					
41.	IA File No. 3030 COUNTY 3740-3744					
42.	IA File No. 3051 COUNTY 3745-3787					
43.	Pictures of Zorinsky Lake (Aug 22, 2013) COUNTY 4379 (A-S)					
44.	DAR Various Dates- Cooper COUNTY 5017-5298					
45.	OPS Quarterly and Annual Reports (2008-2 nd Quarter 2016)					

	COUNTY 5459-5636					
46.	Ethics and Rules of Conduct -Staff Development Division PowerPoint COUNTY 6362-6465					
47.	CALEA Model Policy Complaint Review PLAINTIFF 10-17					
48.	News Article: ACLU report criticizes Nebraska law enforcement's citizen complaint procedures PLAINTIFF 18-20					
49.	Addressing Sexual Offenses and Misconduct by Law Enforcement PLAINTIFF 3227-3246					
50.	IACP National Law Enforcement Policy Center. Harassment and Discrimination PLAINTIFF 3247-3282					
51.	IACP Addressing Sexual Offenses and Misconduct by Law Enforcement: Executive Guide PLAINTIFF 3227-3246					
52.	2013 Cops out of Control PLAINTIFF 3283-3285					
53.	INTERPOL's International Police Training Journal PLAINTIFF 3286-3296					
54.	Peace Officer Psychological Screening Manual PLAINTIFF 3297-3528					
55.	<i>2010 Q3 National Police Misconduct Statistical Report</i> , Cato Institute, November 7, 2010 Dckt. 150-4					
56.	<i>Hundreds of Officers Lose Licenses over Sex Misconduct</i> , Associated Press, Nov. 1, 2015 Dckt. 150-1					
57.	<i>The Police Brutality Nobody Talks About— Officer-Involved Sexual Misconduct</i> , Cato Institute, Nov. 5, 2009 Dckt. 150-5					
58.	<i>Officers who rape: The Police Brutality Chiefs Ignore</i> PLAINTIFF 3529-3541					
59.	Declaration of Sheriff Tim Dunning * Dckt. 125-3					
60.	Declaration of Martin Bilek * Dckt. 125-4					

61.	Declaration of Thomas Wheeler * Dckt. 125-5					
62.	Declaration of Nathan Kovarik * Dckt. 125-6					
63.	Declaration of William Woodward * Dckt. 125-7					
64.	Declaration of Michael Dechellis * Dckt. 125-8					
65.	Declaration of Theresa Ogorzaly * Dckt. 125-9					
66.	Declaration of Jennifer Birkhofer * Dckt. 125-10					
67.	Declaration of Dale Rathe * Dckt. 125-11					
68.	Declaration of Shawn Milikan * Dckt. 125-12					
69.	Declaration of Andrew Woodward * Dckt. 125-13					
70.	Declaration of Eric Olson * Dckt. 125-14					
71.	Declaration of Matthew Martin and Exhibits * Dckt. 125-15-46					
72.	Declaration of James Maguire * Dckt. 125-49					
73.	Declaration of Rob Sofie * Dckt. 125-50					
74.	Declaration of Donald Kleine * Dckt. 125-51					
75.	Declaration of Daniel Esch * Dckt. 125-52					
76.	Declaration of Andrew Kubik * Dckt. 125-53					
77.	Declaration of Robert Jones * Dckt. 125-55					
78.	Declaration of Gregory Sampson * Dckt. 125-56					
79.	Tom Tremblay Report and Supplemental Report under Federal Rule of Civil Procedure 26(a)(2), including CV and list of testimony.					
80.	Providence Police Department Testing Investigation * Dckt. 153-1					
81.	<i>Kessler v. City of Providence</i> , No. C.A. 05- 1301, 2005 WL 2717639 (R.I. Sup. Ct. Oct.					

	20, 2005) * Dckt. 153-2					
82.	Defendant Cooper's Responses to Plaintiff's Discovery					
83.	Defendant Dunning's Responses to Plaintiff's Discovery					
84.	Defendant Douglas County's Responses to Plaintiff's Discovery					
85.	Kristine Love deposition transcript (<i>State v. Cooper</i>) * COOPER 98-133 COUNTY 1005-1040 Dckt. 129-20					
86.	Lance Worley deposition transcript (<i>State v. Cooper</i>) * COOPER 383-409 COUNTY 1041-1084 Dckt. 129-21					
87.	Michael Dechellis deposition transcript and exhibits (<i>State v. Cooper</i>) * COOPER 522-549 COUNTY 899-953					
88.	Kyle Worland deposition transcript (<i>State v. Cooper</i>) * COUNTY 208-284 COUNTY 1280-1356 Dckt. 130-6					
89.	David Galvan deposition transcript and exhibits (<i>State v. Cooper</i>) * COUNTY 794-870					
90.	Jennifer Birkhofer deposition transcript (<i>State v. Cooper</i>) * COUNTY 954-988 Dckt. 130-29					
91.	Robert Butler deposition transcript (<i>State v. Cooper</i>) * COUNTY 989-1004					
92.	Autumn Hudnall deposition transcript (<i>State v. Cooper</i>) * COUNTY 1085-1129 Dckt. 130-27					
93.	Emily Palmer deposition transcript (<i>State v. Cooper</i>) * COUNTY 1130-1179 Dckt. 130-31					
94.	Robert Jones deposition transcript (<i>State v.</i>					

	<i>Cooper</i>) * COUNTY 1180-1216 Dckt. 130-32					
95.	Matt Martin deposition transcript (<i>State v. Cooper</i>) * COUNTY 1217-1279 Dckt. 130-10					
96.	Cory Cooper 9/29/16 & 11/5/16 deposition transcript and exhibits * Dckt. 125-2 Dckt. 130					
97.	Lance Worley 11/4/16 deposition transcript and exhibits * 125-47 Dckt. 129-30					
98.	Kristine Love 9/30/16 deposition transcript and exhibits * Dckt. 125-48					
99.	Jack Ryan 2/1/18 deposition transcript and exhibits * Dckt. 125-57-59 Dckt. 129-24					
100.	Jack Ryan 8/30 deposition transcript and exhibits (<i>Horn v. City of Covington</i>) * Dckt. 153-3					
101.	Tom Tremblay 2/15/18 deposition transcript and exhibits * Dckt. 125-60					
102.	Molly Keane 9/30/16 deposition transcript and exhibits * Dckt. 125-61 Dckt. 130-7					
103.	David Galvan 2/15/17 deposition transcript and exhibits * Dckt. 129-2					
104.	David Galvan 2/5/17 deposition transcript and exhibits * Dckt. 129-3					
105.	Timothy Dunning 2/14/17 deposition transcript and exhibits * Dckt. 129-5					
106.	Timothy Dunning 2/15/17 deposition transcript and exhibits * Dckt. 129-35					
107.	Gregory Sampson 2/15/17 deposition transcript and exhibits *					

	Dckt. 129-26					
108.	Matthew Martin 9/28/16 deposition transcript and exhibits * Dckt. 125-16					
109.	Matthew Martin 2/15/17 deposition transcript and exhibits * Dckt. 129-31					
110.	Robert Jones 11/3/16 deposition transcript and exhibits * Dckt. 130-1					

* Denotes exhibits that Plaintiff may offer only if the need arises

RESPECTFULLY SUBMITTED,

/s/ Cindy Tsai

Attorneys for Plaintiff Megan McGuire

Arthur Loevy
Jon Loevy
Cindy Tsai
Mark Loevy-Reyes
LOEVY & LOEVY
311 N. Aberdeen St., 3rd Floor
Chicago, IL 60607
(312) 243-5900

CERTIFICATE OF SERVICE

I, Cindy Tsai, an attorney, hereby certify that on July 16, 2018, I electronically filed the foregoing Plaintiff's Exhibit List using the CM/ECF system, which will send notification of such filing to all parties except for Cory Cooper, and I hereby certify that I have e-mailed the document to the following non-CM/ECF participant:

Cory Cooper
c.cooper.417@gmail.com

/s/ Cindy Tsai
One of Plaintiff's Attorneys